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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION
11

12 AMBASSADOR MARC GINSBERG and) CASE NO.: 5:21-CV-00570-BLF
13 COALITION FOR A SAFER WEB,)
14 Plaintiffs,) **JOINT STIPULATION AND**
15 v.) **[PROPOSED] ORDER TO EXTEND**
16 GOOGLE INC.,) **DEADLINE TO RESPOND TO**
17 Defendant.) **FIRST AMENDED COMPLAINT**
18)
19 _____)

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JOINT STIPULATION

Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, “Plaintiffs”), and Defendant Google LLC, erroneously sued as Google Inc. (“Google”), jointly submit this Stipulation to extend Google’s deadline to respond to Plaintiffs’ First Amended Complaint (“FAC”):

WHEREAS, Plaintiffs filed their complaint on January 25, 2021;

WHEREAS, Google filed a motion to dismiss the complaint (ECF 14);

WHEREAS, pursuant to the stipulation of the parties (ECF 15) granted by this Court (ECF 16), Plaintiffs' deadline to submit an opposition to Google's motion to dismiss was June 7, 2021;

WHEREAS, in lieu of filing an opposition to Google's motion to dismiss, Plaintiffs filed their FAC on June 8, 2021 (ECF 17);

WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(3), Google's deadline to respond to Plaintiffs' FAC is June 22, 2021;

WHEREAS, Google’s counsel conferred with Plaintiffs’ counsel to request an extension of Google’s deadline to respond to the FAC, and Plaintiffs’ counsel agreed to an extension of Google’s response deadline to July 13, 2021;

WHEREAS, the parties submit that this extension is appropriate to permit Google adequate time to assess and respond to the amended complaint, and in light of overlapping deadlines in other matters;

THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval,
to the following:

1. Google’s deadline to respond to Plaintiffs’ FAC shall be extended from June 22, 2021 to July 13, 2021.
2. Google consents to Plaintiffs’ filing of a corrected complaint for the sole purpose of changing the party name in the caption from “Google, Inc.” (which is incorrect) to “Google LLC.”

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2 Dated: June 10, 2021
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Respectfully submitted,
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

4 By: /s/ Lauren Gallo White
5 Lauren Gallo White
lwhite@wsgr.com

6 *Attorneys for Defendant*
7 GOOGLE LLC

8 Dated: June 10, 2021

THE LAW OFFICE OF KEITH ALTMAN

9 By: /s/ Keith Altman
10 Keith Altman
kaltman@lawampmmt.com

11 *Attorneys for Plaintiffs*
12 AMBASSADOR MARC GINSBERG and
13 COALITION FOR A SAFER WEB

14 **SIGNATURE ATTESTATION**

15 I, Lauren Gallo White, hereby attest that all other signatories listed, and on whose behalf
16 the filing is submitted, concur in the filing's content and have authorized the filing of this e-filed
17 document.

18 By: /s/ Lauren Gallo White
19 Lauren Gallo White

20 PURSUANT TO STIPULATION, IT IS SO ORDERED

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22 Dated: June 16, 2021



23 Honorable Beth Labson Freeman
United States District Court Judge